

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WILLIAM J. MARTIN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MEREDITH CORPORATION,
MEREDITH HOLDINGS CORPORATION,
IAC/INTERACTIVECORP, DOTDASH
MEDIA, INC. and DOTDASH MEREDITH,
INC.,

Defendants.

Civil Action No. 1:22-cv-04776-DLC

DECLARATION OF ALEXANDER J. KASNER IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS

I, ALEXANDER J. KASNER, declare as follows:

1. I am an attorney licensed to practice law in California and the District of Columbia and am admitted to practice on a *pro hac vice* basis before this Court. I am an attorney at the law firm of Cooley LLP, counsel for Defendants Meredith Corporation, Meredith Holdings Corporation, IAC Inc., f/k/a IAC/InterActiveCorp, Dotdash Media, Inc., and Dotdash Meredith, Inc. (collectively, "Meredith" or "Defendants"). I submit this Declaration in Support of Defendants' Motion to Dismiss Plaintiff's Complaint ("Motion"). I have personal knowledge of the facts contained herein and if called as a witness could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the webpage: *Meta Pixel*, Meta for Developers, available at <https://developers.facebook.com/docs/meta-pixel>, and obtained on September 13, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the webpage: *Metal Pixel Reference: Standard Events*, Meta for Developers, available at <https://developers.facebook.com/docs/meta-pixel/reference#standard-events>, and obtained on September 16, 2021.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the webpage: Katie Campione, *Ryan Reynolds Hilariously Trolls Wife Blake Lively on Her Birthday*, People.com (Aug. 26, 2021), available at <https://people.com/movies/ryan-reynolds-hilariously-trolls-wife-blake-lively-on-her-birthday>.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the webpage: Taylor Jean Stephan, *Jennifer Garner Sported a New Style from Her Go-To Comfy Sneaker Brand – Get Her Exact Pair at Amazon*, People.com (Aug. 7, 2022), available at <https://people.com/style/jennifer-garner-new-brooks-running-shoes>.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the homepage of People.com, obtained on September 13, 2022. Where article thumbnail images contain a video icon, the icon has been circled in red.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the webpage: Jen Juneau, *Jenna Bush Hager Recalls Having Dinner with King Charles the Night Before He Became Monarch*, People.com (Sept. 13, 2022), available at <https://people.com/royals/jenna-bush-hager-had-dinner-with-prince-charles-night-before-he-became-king>.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 16th day of September 2022.

Respectfully submitted,

/s/ Alexander J. Kasner

Alexander J. Kasner (*pro hac vice*)

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that, on this 16th day of September 2022, this document, filed through the CM/ECF system, will be served electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Tiana Demas

Tiana Demas

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